

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Andres Gabriel LARIOS

Case: 2:25-mj-30137

Assigned To : Unassigned

Assign. Date : 3/13/2025

Case No.

Description: RE: ANDRES GABRIEL
LARIOS (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 25-26, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2113(b), 2

Bank Theft

18 U.S.C. § 371

Conspiracy

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: March 12, 2025City and state: Detroit, Michigan*Complainant's signature*Special Agent Randal Cummings - HSI*Printed name and title**Judge's signature*Honorable David R. Grand, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Randal Cummings, being first duly sworn, state as follows:

INTRODUCTION

1. I have been a Special Agent with Department of Homeland Security Homeland Security Investigations (HSI) since August 2010 and am currently assigned to the Office of Investigations in Detroit, Michigan. Since December 2014, I have been a member of the U.S. Secret Service led Southeast Michigan Cyber Fraud Task Force and have investigated federal criminal violations of bank fraud, wire fraud, access device fraud, identity theft, child exploitation, and human trafficking.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, detectives, and witnesses, both in person and in documentary form. This affidavit does not contain every fact that I have learned during the investigation but instead includes only those facts necessary to establish probable cause in support of this criminal complaint.

3. As set forth in more detail below, probable cause exists that Andres Gabriel LARIOS (Larios) violated 18 U.S.C. §§ 2113(b), 2 (bank theft) and 18 U.S.C. § 371 (conspiracy).

PROBABLE CAUSE

4. On February 27, 2025, C.C. Credit Union in Livonia, Michigan (hereby the Credit Union) notified authorities that that two of the three ATMs in the businesses parking lot (ATMs #1 and 2) were missing money.

5. The Credit Union is federally insured by the National Credit Union Administration.

6. The Credit Union's surveillance footage showed that on February 25, 2025, at approximately 10:50 P.M., a black Dodge Durango with a missing gas cap pulled up to ATM #2. There were multiple occupants, all of whom had their faces covered except the driver. One male occupant whose face was covered opened the bottom of the ATM using a specialized key. He then connected an unknown device to the ATM which disabled its electronic security system. As a result, the ATM began to release cash from the vault. The Durango remained on scene for approximately 15 minutes while ATM #2 released cash, then left the area. Between approximately 11:15 P.M. to around midnight, the Durango twice left and returned to ATM #2 with different suspects taking turn withdrawing cash from the machine.

7. On February 26, 2025, at approximately 3:10 A.M. hours, the same Durango returned to the Credit Union and pulled up to its ATM #1. From then until approximately 4:00 A.M., the Durango again made several trips to and away

from ATM #1, during which its occupants took turns defeating ATM #1's security system and withdrew cash from it.

8. Based on my training experience, I know that the suspects were engaging in an ATM jackpotting scheme. "ATM jackpotting" is the exploitation of ATMs' physical and software vulnerabilities that result in the machines dispensing cash to unauthorized fraudsters. Typically, during ATM jackpotting events, one or two people use a key to access the inside of an ATM to install a foreign device that allows a hacker to assume control of the ATM. After the ATM is compromised, groups of individuals arrive at the ATM to conduct transactions and the ATM dispenses its cash reserves, which are untethered to any bank account.

9. Using the picture of the Durango driver captured by ATM#2's camera, law enforcement identified Larios as a potential suspect. Further inquiries showed that Larios received a ticket on September 25, 2023, in a blue 2016 Dodge Challenger bearing Michigan license plate "LARIOS." Inquiries into this license plate showed a black Durango bearing Michigan license plate LARIOS in south of Dearborn, Michigan on February 28, 2025. This black Durango has a missing gas cap, similar to the car used by the suspects to steal money from the Credit Union's ATMs on February 25 and 26.

10. Larios's 2023 ticket listed his address in Melvindale, Michigan. On February 28, 2025, law enforcement conducted a drive by of this location and saw

across the street a black Durango with a missing gas cap with Michigan license plate LARIOS. Officers conducted further surveillance of Lario's Melvindale's house on February 28. They saw Larios exited the residence and entered the black Durango, after which he drove it away as the sole occupant. Larios was later pulled over and arrested on an outstanding warrant for driving with suspended license.

11. A review of Larios's phone pursuant to a state search warrant uncovered images of the Credit Union's ATMs and communications implicating Larios in ATM jackpotting schemes.

CONCLUSION

12. Probable cause exists to believe that Larios committed and conspired with other to commit bank theft, in violation of 18 U.S.C. §§ 2113(b), 2, and 371.

Respectfully submitted,



Randal Cummings, Special Agent
Homeland Security Investigation

Subscribed and sworn to before me
and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

Date: March 12, 2025